

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

KEYCORP,)	
)	
Plaintiff,)	CIVIL ACTION NO. 3:16-CV-01948-D
)	
vs.)	JUDGE FITZWATER
)	
ALLISON HOLLAND, <i>et al.</i> ,)	MAGISTRATE HORAN
)	
Defendants.)	

DECLARATION OF JACQUELINE C. JOHNSON

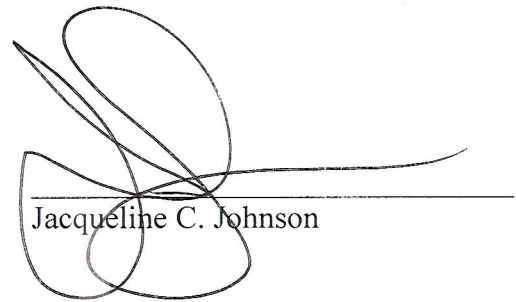
I, Jacqueline C. Johnson, hereby declare as follows:

1. I am a shareholder at Littler Mendelson, P.C., located in Dallas Texas. I have practiced law for approximately 20 years. My practice has been based in the Dallas area for the last 19 years. I am the co-chair of the Unfair Competition and Trade Secrets Practice Group at Littler Mendelson, P.C.
2. I am admitted to practice law in the state of Texas, all Texas Federal District Courts, and in front of the 5th Circuit Court of Appeals.
3. As a result of my practice in the Dallas Metropolitan Area, I am familiar with the prevailing market rates for skilled and competent attorneys in the community.
4. At my firm, the normal rates of attorneys with ten years of civil litigation experience ranges from \$435 to \$700 for the most experienced partner at my firm in Dallas. These rates are consistent with rates charged by comparable firms in this area.
5. I am local counsel for Plaintiff Key Corp, and am therefore aware of the nature of the above captioned case. I have reviewed the hourly rates being charged by Plaintiff's attorneys at Kaufman & Company in Cleveland, Ohio, including rates of \$175 / \$205 for associates and

\$385 for partners. In my professional opinion, these rates are reasonable and within the market ranges for comparably qualified attorneys practicing in the Dallas area.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct.

Executed this 19th day of December, 2016.



Jacqueline C. Johnson